

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:14-cr-153 ERW (TCM)
)	
JAMES STALEY,)	
)	
Defendant.)	

SECOND MOTION TO CONTINUE TRIAL

COMES NOW Defendant, James Staley, by and through counsel, and hereby moves this Court to continue the trial presently scheduled for April 27, 2015 for a period of thirty (30) days. In support of this motion, Defendant states as follows:

1. Defendant was arraigned on a second superseding indictment on March 11, 2015.
2. Shortly after arraignment, Defendant received additional discovery relevant to both the single charge added in the second superseding indictment and the charges included in the first superseding indictment
3. Accordingly, Defendant files the instant motion to obtain the needed to review this material, assess its impact on Defendant's case, and discuss the same with Defendant.
4. For these same reasons, the instant motion is necessary to provide counsel for the "defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, "the ends of justice served by [granting this motion] outweigh the best interest of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A).

5. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Dianna Collins. Ms. Collins does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the trial presently scheduled for April 27, 2015 for a period of thirty (30) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
ADAM D. FEIN, #52255 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332/Facsimile (314)862-8050

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Dianna Collins Assistant United States Attorney.